

EXHIBIT E

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Kyle Donovan

Docket No.: 18-CV-6950

Plaintiff,

**AFFIDAVIT OF MAKINI
VELAZQUEZ**

-against-

East Twelfth Street Tenants Housing
Development Fund Corporation

Defendants.
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I, Makini Velazquez, being duly sworn, do hereby depose and state as follows:


1. I reside at the East Twelfth Street Tenants Housing Development Fund Corporation (hereinafter "HDFC").
2. I am a board member of the HDFC.
3. I am submitting the instant affidavit in support of the Opposition to the Plaintiff's motion which seeks issuance of a Temporary Restraining Order prohibiting the Defendant HDFC from approving the sale of Unit MW, along with the accompanying 250 shares in the Corporation, to anyone other than the Plaintiff and against issuance of a preliminary injunction.
4. Plaintiff's unsubstantiated claims against the HDFC are based on alleged discrimination because the Plaintiff is an African American.
5. The HDFC is a diverse building composed of the following shareholders/residents with the following racial makeup:

Hispanic: 13
African American: 7
Asian: 6
Caucasian: 17

6. Over sixty percent (60%) of the HDFC occupants identify as minorities.

Respectfully submitted,


Dated: New York, New York
August 9, 2018


Makini Velazquez

STATE OF NEW YORK
COUNTY OF NEW YORK

On August 9, 2018, the above-named Makini Velazquez personally appeared and made oath that the foregoing statements subscribed by her are true and accurate to the best of her knowledge, information and belief.

Before me,


Notary Public

